

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

DAVID J. CATANZARO	:	
Plaintiff	:	Jury Trial Demanded
	:	
vs.	:	(Honorable Judge
	:	Malachy E. Mannion)
WALMART STORES, INC., et al.	:	
Defendants	:	No. 3:22-CV-1768

.....

**DEFENDANT CURRENT MEDIA GROUP LLC’S UNOPPOSED MOTION
FOR SECOND EXTENSION OF TIME TO RESPOND TO PLAINTIFF’S
THIRD AMENDED COMPLAINT (ECF NO. 23)**

Defendant Current Media Group LLC¹ (“CMG” or “Defendant”), by and through their undersigned counsel, hereby files this Motion for Second Extension of Time to move, answer, or otherwise respond to the Third Amended Complaint (ECF No. 23) (“Complaint”) of David J. Catanzaro (“Plaintiff” or “Catanzaro”). In support of this Motion, Defendant states as follows:

1. On January 6, 2023, Plaintiff filed a Complaint alleging, *inter alia*, that Defendant infringes U.S. Patent No. 7,653,959.

2. Plaintiff served the Complaint on Defendant on June 14, 2023.

Accordingly, Defendant’s motion, answer, or other response to the Complaint was due on July 5, 2023.

¹ The Complaint incorrectly names Current Media Group Inc.

3. On June 30, 2023, Defendant requested, and Plaintiff agreed to an extension of 30 days until and including August 4, 2023, for Defendant to move, answer, or otherwise respond to the Complaint.

4. On July 6, 2023 by Court Order (Doc. 37) the extension of time was granted to August 4, 2023.

5. The parties are currently in the process of exploring the possibility of resolving this matter without further Court intervention.

6. Accordingly, Defendant requested, and Plaintiff agreed to a second extension of 30 days until and including September 3, 2023, for Defendant to move, answer, or otherwise respond to the Complaint. Defendant therefore files this Motion unopposed.

7. No Scheduling Order has been entered in this case and no deadlines have been set.

Accordingly, Defendant, Current Media Group LLC, respectfully requests that the Court grant this unopposed Motion and extend the deadline for Defendant to move, answer, or otherwise respond to the Complaint up to and including September 3, 2023.

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

Date: August 3, 2023

By: /s/J. Timothy Hinton, Jr., Esq.

J. Timothy Hinton, Jr., Esq.

PA ID No. 61981

1401 Monroe Ave, Suite 2

Dunmore, PA 18509

(570) 344-9845

timhinton@haggertylaw.net

Attorney for Defendant,

Current Media Group LLC

CERTIFICATE OF SERVICE

I, J. Timothy Hinton, Jr., Esquire, here by certify that I have served a true and correct copy of the foregoing Motion for Second Extension of Time to move, answer, or otherwise respond to the Third Amended Complaint by the court's Electronic Filing System and as follows:

David J. Catanzaro
286 Upper Powderly Street
Carbondale, PA 18407
Pro Se

RESPECTFULLY SUBMITTED,

HAGGERTY HINTON & COSGROVE LLP

Date: August 3, 2023

By: /s/J. Timothy Hinton, Jr., Esq.
J. Timothy Hinton, Jr., Esq.
1401 Monroe Ave, Suite 2
Dunmore, PA 18509
(570) 344-9845
timhinton@haggertylaw.net
Attorney for Defendant,
Current Media Group LLC